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16 **Attorneys for Defendant**
17 ***LAURI VALJAKKA***

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **OAKLAND DIVISION**

21 LAURI VALJAKKA,
22 Plaintiff,
23 v.
24 NETFLIX, INC.,
25 Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF LAURI
VALJAKKA IN NONOPPOSITION
OF MOTION TO JOIN AIPI, LLC**

Judge: Jon S. Tigar

26 I, Lauri Valjakka, declare as follows:

27 1. My name is Lauri Valjakka. I am over 18 years of age, and have personal
28 knowledge of the facts set forth in this declaration. I make this declaration in non-
opposition of Motion to Join AiPi, LLC (Doc. No. 217). I am the plaintiff in the
above-captioned matter and have personal knowledge of the statements below and

1 can testify as to the truth of each.

2 2. I contacted Eric Morehouse in March to April of 2021 about pursuing
3 companies I believed were infringing my U.S. Pat. No. 8,495,167 (“the ‘167 patent”).
4 He introduced me to his company, AiPi, LLC.

5 3. I worked primarily with Eric Morehouse (“Morehouse”) and Erik Lund
6 (“Lund”) at AiPi. Morehouse and Lund, through AiPi, provided me technical and
7 legal services. I considered both Morehouse and Lund as my lawyers.

8 4. In providing legal services, Morehouse and Lund helped me identify
9 alleged infringers, including Netflix, draft claim charts and draft complaints against
10 the alleged infringers.

11 5. The complaints were filed by Ramey LLP and another firm, but AiPi,
12 through Morehouse and Lund, continued to provide me legal services and I regard
13 both as my lawyers. AiPi has been engaged in all legal decision making from the
14 filing of the lawsuit to the present.

15 I declare under penalty of perjury and the laws of the United States of America that
16 the foregoing is true and correct.

17
18 Executed on this 9th day of November, 2023.

19
20 Dated: November 9, 2023

21 /s/ 
22 Lauri Valjakka